

MOED-0001

DISCLOSURE STATEMENT

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

Acuity, A Mutual Insurance Company)	
)	
Plaintiff(s),)	
)	
vs.)	Case No. 4:24-cv-01277
)	
Riverdale Packaging Corporation; Lora)	
Property Investments, LLC and Wombat)	
Acquisitions, LLC)	
Defendant(s).)	

DISCLOSURE STATEMENT

Pursuant to Local Rule 2.09 and Federal Rule of Civil Procedure 7.1, Counsel of record for
Defendant Wombat hereby discloses the following:

1. If the subject is a nongovernmental corporate party or a nongovernmental corporation that seeks to intervene,
 - a. Whether it is publicly traded, and if it is, on which exchange(s):
No.
 - b. Its parent companies or corporations (if none, state "none"):
None.
 - c. Its subsidiaries not wholly owned by the subject (if none, state "none"):
4501 Gustine Avenue LLC - Organized under Missouri Law with membership consisting only of Javier Hinojo, a North Carolina citizen
 - d. Any publicly held company or corporation that owns five percent (5%) or more of the subject's stock (if none, state "none"):
None.
2. If the subject is a party or intervenor in an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), the name and citizenship of every individual or entity whose citizenship is attributed to that party or intervenor, including all members, sub-members, general and limited partners, and corporations:
Defendant Wombat Acquisitions' sole member is Javier Hinojo, who is a citizen of North Carolina. Defendant Wombat Acquisitions' is a successor in interest in the purported assignment at issue to non-party All States Security, a Wyoming corporation with membership only of Javier Hinojo. Defendant Wombat Acquisitions' partial subsidiary company 4501 Gustine Avenue LLC owns the underlying property at issue located in St. Louis City, Missouri.

Note: Sub-members include the members of members (i.e., first-tier sub-members), and the members of first-tier sub-members (i.e., second-tier sub-members), the members of second-tier sub-members (i.e., third-tier sub-members), and so on, until the Court knows the citizenship of *all* persons and entities within the ownership structure. Further, if a corporation is a member or sub-member of the subject organization, that corporation's state of incorporation and principal place of business must be disclosed.

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By signing this form, counsel acknowledges that “if any required information changes,” and/or “if any later event occurs that could affect the court’s jurisdiction under 28 U.S.C. § 1332(a),” counsel will file a Disclosure Statement promptly, and no later than seven (7) days of the change or event. EDMO L.R. 2.09(C); *see also* Fed. R. Civ. P. 7.1(a)(2)(B) and 7.1(b)(2).

/s/ Joseph Ott

Signature (Counsel for Plaintiff/Defendant)

Print Name: Joseph A. Ott

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Phone: 314-303-9360

Certificate of Service

I hereby certify that a true copy of the foregoing Disclosure Statement was served (by mail, by hand delivery, or by electronic notice) on all parties on:

October 24, 2024.

/s/ Joseph Ott

Signature